

EXHIBIT 2

Jeff Nardinelli

From: Jeff Nardinelli
Sent: Wednesday, April 12, 2017 7:37 AM
To: Gonzalez, Arturo J.; UberWaymo
Cc: QE-Waymo
Subject: RE: Waymo v. Uber, No. 17-cv-00939, PROD008
Attachments: Waymo Privilege Log (Brown - Updated).pdf

Arturo,

As stated, we redacted/withheld Mr. Brown's notes to the extent they reflect any investigation beyond the scope of his declaration. Please find attached an updated privilege log for Mr. Brown. The final two items relate to Mr. Brown's notes.

Thanks,
Jeff

From: Gonzalez, Arturo J. [mailto:AGonzalez@mofo.com]
Sent: Tuesday, April 11, 2017 6:10 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; UberWaymo <UberWaymo@mofo.com>
Cc: QE-Waymo <qewaymo@quinnemanuel.com>
Subject: Waymo v. Uber, No. 17-cv-00939, PROD008
Importance: High

Jeff,

What specific notes you have withheld? Please provide us with a log of those withheld notes. The second document (4332) is almost entirely redacted. Why is that?

Arturo J. González
Chair, Commercial Litigation and Trial Practice Group
Morrison & Foerster LLP
425 Market St. | San Francisco, CA 94105
P: 415.268.7020 | F: 415.276.7020 | C: 415.425.9548
AGonzalez@mofo.com | www.mofo.com

From: Jeff Nardinelli [mailto:jeffnardinelli@quinnemanuel.com]
Sent: Monday, April 10, 2017 3:51 PM
To: UberWaymo
Cc: QE-Waymo
Subject: Waymo v. Uber, No. 17-cv-00939, PROD008

- External Email -

Arturo,

Per and consistent with our discussion this morning, I have attached notes from Mr. Brown as Uber has requested. The production of the notes concerns and is limited to the disclosures in his declaration regarding the investigations addressed therein. This production is without waiver of and without prejudice to any other

work product protection/privilege. To the extent his notes reflect any other investigation beyond the scope of his declaration, that material has been redacted/withheld as work product.

Thanks,
Jeff

Jeff Nardinelli
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6325 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
jeffnardinelli@quinnemanuel.com
www.quinnemanuel.com

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